

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

NORMAN L. NICHOLS, JR.	:	
	:	Civil Action No.
	:	JFM-02-CV-3523
Plaintiff	:	
v.	:	
	:	
	:	
CAROLINE COUNTY BOARD OF EDUCATION	:	
	:	
Defendant	:	
	:	
	:	

**PLAINTIFF'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE  
OPPOSITION TO MOTION TO FOR SUMMARY JUDGMENT**

Plaintiff, by his attorney, Frederick P. Charleston, Esq., respectfully moves the court to extend the time to file his opposition to Defendant's Motion For Summary Judgment up to and including December 16, 2003, and as grounds therefore, asserts:

1. Plaintiff's opposition is due December 9, 2003.
2. Defendant's Motion and Memorandum consists of 38 pages plus 33 exhibits and seeks to resolve all issues in this case.
3. On Friday, December 5, 2003, counsel for Plaintiff suffered an attack of vertigo which left him unable to function the rest of that day because of extreme dizziness and an unsteady gait. Through treatment by his physician and medication counsel has improved but continues to suffer sporadic effects of the vertigo. As such, counsel has been unable to complete the opposition for filing by the due date.
4. Counsel for Defendant have authorized counsel for Plaintiff to represent herein that they have no objection to the granting of this motion for an additional extension of time.

Wherefore, for the reasons set forth above, or for whatever other reasons the Court deems just and proper, Plaintiff requests the Court extend the time for filing his opposition to Defendant's motion for summary judgment up to and including December 16, 2003.

Respectfully Submitted,

\_\_\_\_\_/s/\_\_\_\_\_  
Frederick P. Charleston, Esq.  
Attorney at Law  
Fed. Ct. Bar No. 02933  
2530 N. Charles St., Suite 201  
Baltimore, Maryland 21218  
(410) 662-0010

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 26th day of November, 2003, a copy of the foregoing Unopposed Motion for Extension of Time To File Opposition To Motion For Summary Judgment was served via facsimile and mailed first class, postage prepaid, to Steven B. Schwartzman, Esq., and Leslie Robert Stellman, Esq., Hodes, Ulman, Pressin & Katz, 901 Dulaney Valley Road, Towson, MD. 21204.

\_\_\_\_\_/s/\_\_\_\_\_  
Frederick P. Charleston, Esq.